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Tami Gadd-Willardson (12517)

Ryan C. Cadwallader (13661)

Sarah L. Olson (14006)

OFFICE OF THE CHAPTER 13 TRUSTEE

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## UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH CENTRAL DIVISION

CASE NO: 15-20236
Chapter 13
Hon. R. KIMBALL MOSIER

## TRUSTEE'S CONTINUING OBJECTION TO CONFIRMATION

KEVIN R. ANDERSON, Chapter 13 Trustee, hereby objects to confirmation based on the following unresolved issues:

- 1. The following creditor objection(s) remain unresolved: the Utah State Tax Commission.
- 2. The plan is not feasible in that it is presently projected to require more than 60 months to make all payments required by the plan.
- 3. The Trustee objects to the proposed treatment in paragraph 12(c) regarding secured creditors of the real property located at 13836 S 2200 W, Bluffdale, UT.
- 4. As of August 4, 2015, the Debtors are now \$2,866.00 (1.52 months) delinquent for payments owing through June 2015.

## **Restatement of Outstanding Issues from Prior Objections:**

1. The Trustee requests the Debtor provide proof that they are making post-petition monthly mortgage payments consistent with Schedule J and paragraph 6(d) of the plan.

- 2. The Chapter 13 plan does not comply with §§ 1322(b) and 1325(a)(5) in that it does not provide for the following secured claim: American Honda Finance Corp.
- 3. Schedule D does not list every creditor that holds a secured claim; specifically, American Honda Finance Corp.

THEREFORE, the Trustee has an ongoing objection to the confirmation

DATED: August 04, 2015

KRA/s/

Kevin R. Anderson, Esq. Standing Chapter 13 Trustee

## **CERTIFICATE OF MAILING**

The undersigned hereby certifies that true and correct copy of the foregoing Trustee's Continuing Objection to Confirmation was served upon all persons entitled to receive notice in this case via ECF notification or by U.S. Mail to the following parties on August 04, 2015:

DAVID M. COOK, ECF NOTIFICATION